

Christina Goodrich (SBN 261722)  
christina.goodrich@klgates.com  
Conner J. Meggs (SBN 336159)  
connor.meggs@klgates.com  
Cassidy T. Young (SBN 342891)  
cassidy.young@klgates.com  
K&L GATES LLP  
10100 Santa Monica Boulevard  
Eighth Floor  
Los Angeles, CA 90067  
Telephone: +1 310 552 5000  
Facsimile: +1 310 552 5001

*Attorneys for Plaintiff  
Entropic Communications, LLC*

*(Additional counsel listed in signature block)*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 2:23-cv-1049-JWH-KES  
(Lead Case)  
Case No. 2:23-cv-1050-JWH-KES  
(Related Case)

**STIPULATION TO SET  
DEADLINE TO RESPOND TO  
OBJECTIONS TO THE SPECIAL  
MASTER REPORT AND  
RECOMMENDATIONS ON  
MOTIONS REFERRED BY THE  
COURT ON FEBRUARY 9, 2024,  
AND MARCH 26, 2024 (DKT. 302);  
[PROPOSED] ORDER**

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

COMCAST CORPORATION, *et al.*,

Defendants.

1 Plaintiff Entropic Communications, LLC (“Entropic”), Defendants CoxCom,  
 2 LLC; Cox Communications California, LLC; Cox Communications, Inc.  
 3 (collectively, “Cox”), and Counter-Defendants MaxLinear, Inc. and MaxLinear  
 4 Communications LLC (collectively, “MaxLinear”) (inclusively, the “Parties”)  
 5 hereby submit the following Stipulation and Proposed Order to Continue the  
 6 Deadline to Respond to Objections to the Special Master Report and  
 7 Recommendations on Motions Referred by the Court on February 9, 2024, and  
 8 March 26, 2024 (“Special Master R&R”) (Dkt. 302) with reference to the following  
 9 facts:

10 WHEREAS, the Special Master R&R determined that the time to file  
 11 objections was 21 days, per FRCP 53. (*Id.* at 86.)

12 WHEREAS, the Special Master R&R did not set a time for the filing of  
 13 responses to objections, but responses to objections are contemplated by the Court’s  
 14 Order Appointing Special Master. (Dkt. 62.)

15 WHEREAS, on May 13, 2024, Cox filed objections to the Special Master  
 16 R&R dated April 22, 2024. (Dkt. 321.) Thereafter, counsel for the Parties conferred  
 17 regarding the deadline to respond to these objections.

18 NOW, THEREFORE, the Parties, by and through their respective counsel,  
 19 hereby STIPULATE AND AGREE as follows:

- 20 1. The deadline to respond to Objections to the Special Master Report and  
 21 Recommendations on Motions Referred by the Court on February 9,  
 22 2024, and March 26, 2024 (Dkt. 302) shall be set as **May 24, 2024**. This  
 23 Stipulation does not contemplate further briefing following the  
 24 responses, unless specifically requested by the Court.
- 25 2. The page limits shall be 10 pages, consistent with the limitation set forth  
 26 in the Order Appointing Special Master (Dkt. 62.)
- 27 3. This request to extend this deadline is not submitted for the purpose of  
 28 delay and no other deadlines will be affected by this extension.

1  
2 Dated: May 16, 2024

Respectfully submitted,

3 By: /s/ Douglas J. Winnard  
4 Michael T. Pieja (SBN 250351)  
5 mpieja@goldmanismail.com  
6 Alan E. Littmann (*pro hac vice*)  
7 alittmann@goldmanismail.com  
8 Douglas Jordan Winnard (SBN 275420)  
9 dwinnard@goldmanismail.com  
10 Shaun Zhang (*pro hac vice*)  
11 szhang@goldmanismail.com.com  
12 Jennifer M. Hartjes (*pro hac vice*)  
13 jhartjes@goldmanismail.com  
14 Kurt A. Holtzman (*pro hac vice*)  
15 kholtzman@goldmanismail.com  
16 Xaviere N. Giroud (*pro hac vice*)  
17 xgiroud@goldmanismail.com  
18 **GOLDMAN ISMAIL TOMASELLI**  
19 **BRENNAN & BAUM LLP**  
20 200 South Wacker Dr., 22nd Floor  
21 Chicago, IL 60606  
22 Tel: (312) 681-6000  
23 Fax: (312) 881-5191

24 Christina Goodrich (SBN 261722)  
25 christina.goodrich@klgates.com  
26 Conner J. Meggs (SBN 336159)  
27 connor.meggs@klgates.com  
28 Cassidy T. Young (SBN 342891)  
cassidy.young@klgates.com  
**K&L GATES LLP**  
10100 Santa Monica Boulevard  
Eighth Floor  
Los Angeles, CA 90067  
Telephone: +1 310 552 5000  
Facsimile: +1 310 552 5001

James A. Shimota (*pro hac vice*)  
jim.shimota@klgates.com  
Jason A. Engel (*pro hac vice*)

1 jason.engel@klgates.com  
2 **K&L GATES LLP**  
3 70 W. Madison Street, Suite 3300  
4 Chicago, IL 60602  
5 Tel.: (312) 372-1121  
6 Facsimile: (312) 827-8000

7 Courtney A. Neufeld (pro hac vice)  
8 courtney.neufeld@klgates.com  
9 **K&L Gates LLP**  
10 925 Fourth Avenue, Suite 2900  
11 Seattle, WA 98104  
12 Telephone: (206) 370-7836  
13 Facsimile: (206) 623-7022

14 *Attorneys for Plaintiff*  
15 *Entropic Communications, LLC*

16 Dated: May 16, 2024

17 Respectfully submitted,

18 By: /s/ April E. Isaacson  
19 April E. Isaacson (SBN 180638)  
20 aisaacson@kilpatricktownsend.com  
21 KILPATRICK TOWNSEND &  
22 STOCKTON LLP  
23 Two Embarcadero Center, Suite 1900  
24 San Francisco CA 94111  
25 (415) 273-8306

26 Sarah Y. Kamran (SBN 347617)  
27 skamran@kilpatricktownsend.com  
28 KILPATRICK TOWNSEND &  
STOCKTON LLP  
1801 Century Park East, Suite 2300  
Los Angeles CA 90067  
(310) 777-3733

Mitchell G. Stockwell (pro hac vice)  
mstockwell@kilpatricktownsend.com  
Vaibhav P. Kadaba (pro hac vice)  
wkadaba@kilpatricktownsend.com

1 Michael J. Turton (*pro hac vice*)  
2 mturton@kilpatricktownsend.com  
3 Courtney S. Dabbieri (*pro hac vice*)  
4 cdabbieri@kilpatricktownsend.com  
5 Christopher S. Leah (*pro hac vice*)  
6 cleah@kilpatricktownsend.com  
7 Andrew N. Saul (*pro hac vice*)  
8 asaul@kilpatricktownsend.com  
9 KILPATRICK TOWNSEND &  
10 STOCKTON LLP  
11 1100 Peachtree Street, NE, Suite 2800  
12 Atlanta GA 30309  
13 (404) 815-6500

*Attorneys for Defendants*  
*Cox Communications, Inc., et al.*

14 Dated: May 16, 2024

Respectfully submitted,

15 By: /s/ John R. Lanham  
16 BITA RAHEBI (CA SBN 209351)  
17 brahebi@mofo.com  
18 ALEX S. YAP (CA SBN 241400)  
19 ayap@mofo.com  
20 ROSE S. LEE (CA SBN 294658)  
21 roselee@mofo.com  
22 **MORRISON & FOERSTER LLP**  
23 707 Wilshire Boulevard, Suite 6000  
24 Los Angeles, California 90017-3543  
25 Telephone: (213) 892-5200  
26 Facsimile: (213) 892-5454

27 RICHARD S.J. HUNG (CA SBN  
28 197425)  
rhung@mofo.com  
**MORRISON & FOERSTER LLP**  
425 Market Street,  
San Francisco, California 94105-  
2482  
Palo Alto, California 94304-1018

1 Telephone: (415) 268-7000  
2 Facsimile: (415) 268-7522

3 BRADLEY LUI (CA SBN 143088)  
4 blui@mofo.com

5 **MORRISON & FOERSTER LLP**  
6 2100 L Street, NW, Suite 900  
7 Washington, DC 20037-1679  
8 Telephone: (202) 887-1500  
9 Facsimile: (202) 887-0763

10 JOHN R. LANHAM (CA SBN 289382)  
11 jlanham@mofo.com

12 **MORRISON & FOERSTER LLP**  
13 12531 High Bluff Drive, Suite 100  
14 San Diego, California 92130-2040  
15 Telephone: (858) 720-5100  
16 Facsimile: (858) 720-5125

17 *Attorneys for Counter-Defendants*  
18 *MaxLinear, Inc. and*  
19 *MaxLinear Communications LLC*  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGNATURE CERTIFICATION**

Pursuant to L.R. 5-4.3.4(a)(2)(i), I, Douglas Jordan Winnard, attest that all other signatories listed herein and on whose behalf the filing is submitted concur in the filing's content and have authorized the filing.

Dated: May 16, 2024

/s/ Douglas J. Winnard  
Douglas Jordan Winnard  
dwinnard@goldmanismail.com  
**GOLDMAN ISMAIL TOMASELLI  
BRENNAN & BAUM LLP**  
200 South Wacker Dr., 22nd Floor  
Chicago, IL 60606  
Tel: (312) 681-6000  
Fax: (312) 881-5191